



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

January 3, 2024

**BY ECF**

The Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Edwin Pagan III, 24 Cr. 641 (JHR)***

Dear Judge Rearden:

The Government writes, in response to the Court's December 24, 2024 Order (Dkt. No. 23), and with the consent of the defendant, to request that the Court adjourn the status conference currently scheduled for January 14, 2025 to a date in early to mid-March 2025 and to also exclude time until the date of the adjourned status conference under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The best dates for defense counsel are March 4, 5, or 6, 2025. The Government is also available those days, or at a later date at the Court's convenience.

The Government has informed the defendant that it is prepared to produce Rule 16 discovery materials, but is waiting to receive a hard drive from the defendant to facilitate that production. We understand that drive should be received shortly. The parties agree that an adjournment of the January 14 status conference is appropriate to permit time for the Government to produce discovery and for the defendant to review that discovery and consider any potential motions.

Respectfully submitted,

EDWARD Y. KIM  
Assistant United States Attorney

By: \_\_\_\_\_ /s/  
Mathew Andrews / Emily Deininger  
Assistant United States Attorneys